

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

June 30, 2022

UNITED STATES OF AMERICA

§
§
§
§

Nathan Ochsner, Clerk of Court

v.

CASE NO.

DOMINIQUE ANDREWS,
Defendant

§
§
§
§

JUDGE

4:22-CR-316

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, AutoZone, is a company headquartered in Memphis, Tennessee, United States which operates as an aftermarket automotive parts and accessories retailer throughout the United States, Mexico, Brazil, and Puerto Rico. The purchase and sales of AutoZone products involves United States currency and consumer goods which are shipped in interstate commerce and which affect interstate commerce.

COUNT ONE

Title 18, United States Code, § 1951(a) –
Interference with Commerce by Robbery

On or about February 4, 2022, in the Houston Division of the Southern District of Texas,

DOMINIQUE ANDREWS

herein defendant, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of AutoZone, located at 14447 Cullen Boulevard, Houston, Texas, which was in the possession and custody of an employee of AutoZone, namely, United States currency and two car scanners, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, § 1951(a).

COUNT TWO

Title 18, United States Code, § 924(c)(1)(A) –
Discharge of a Firearm during and in Relation to a Crime of Violence

On or about February 4, 2022, in the Houston Division of the Southern District of Texas,

DOMINIQUE ANDREWS

herein defendant, did knowingly use, carry, brandish and discharge a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery, as alleged in Count One.

In violation of Title 18, United States Code, § 924(c)(1)(A)(iii).

COUNT THREE

Page 2 of 4

Title 18, United States Code, §§ 1951(a) –
Interference with Commerce by Robbery

On or about February 4, 2022, in the Houston Division of the Southern District of Texas,

DOMINIQUE ANDREWS

herein defendant, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of AutoZone, located at 5501 Telephone Road, Houston, Texas, which was in the possession and custody of an employee of AutoZone, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, § 1951(a).

COUNT FOUR

Title 18, United States Code, § 924(c)(1)(A) –
Discharge of a Firearm during and in Relation to a Crime of Violence

On or about February 4, 2022, in the Houston Division of the Southern District of Texas,

DOMINIQUE ANDREWS

herein defendant, did knowingly use, carry, brandish and discharge a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery, as alleged in Count Three.

In violation of Title 18, United States Code, § 924(c)(1)(A)(iii).

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that the firearm(s), involved in violation of Title 18, United States Code, Section 924(c) as charged in Count Two, are subject to forfeiture, including, but not limited to, the following:

A 9mm Luger Taurus Model PTIII Mellinium G2, Serial Number: TIR31747 and all attendant magazines, clips and ammunition.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

JENNIFER LOWERY
United States Attorney

By:



Erin M. Epley
Assistant United States Attorney
Southern District of Texas